

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
v.)	CRIM. NO. 14-CR-10143
)	
JOSH A. WAIRI)	
_____)	

DEFENDANT'S MOTION TO CONTINUE SENTENCING HEARING

The defendant, Josh A. Wairi, moves that this Court continue the sentencing hearing in this case, currently scheduled for July 29, 2015 to a date in September of 2015 that is convenient to the Court and the parties. As grounds therefore, the defendant states the following:

1. Lead defense counsel, Attorney J. W. Carney, Jr., is on vacation for the remainder of the month of June and the first week of July. He is scheduled to return to work on July 6, 2015.

2. Attorney Carney respectfully requests additional time so that he may properly and thoroughly prepare for the defendant's sentencing in the instant case.

3. Attorney Carney requests a September date because he has a substantial trial scheduled to commence in mid-August in New Hampshire. This will require extensive preparation throughout the month of August.

4. He is not aware of any prejudice that the government would suffer if sentencing were to be continued.

The defendant therefore moves that this Court reschedule the sentencing hearing for a date in September of 2015.

JOSH A. WAIRI
By His Attorneys,

CARNEY & ASSOCIATES

J. W. Carney, Jr.

J. W. Carney, Jr.
B.B.O. # 074760

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Dated: June 22, 2015

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AFFIDAVIT SUPPORTING DEFENDANT'S MOTION
TO CONTINUE SENTENCING HEARING

I, J. W. Carney, Jr., state that the facts contained in the attached motion are true to the best of my information and belief.

Signed under the penalties of perjury.

J. W. Carney, Jr.
J. W. Carney, Jr.

Dated: June 22, 2015

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on or before the above date.

J. W. Carney, Jr.

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